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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New
York non-profit corporation, and WR
PROPERTY LLC, a New Jersey limited
liability company,

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,
MICHAEL REINA, ROBERT NIXON,
HELENE SCHLEGEL, JEFFREY PURPURO,
WILLIAM CAMPBELL, and KENNETH
PIESLAK,

Defendants.

Civ. No. 3:17-CV-03226

**MOTION FOR PRELIMINARY INJUNCTION PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 65**

COME NOW Plaintiffs and move this Court for a Preliminary Injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure seeking preliminary orders as follows:

1. Enjoining Defendants, TOWNSHIP OF JACKSON, NEW JERSEY, MICHAEL REINA, ROBERT NIXON, HELENE SCHLEGEL, JEFFREY PURPURO, WILLIAM CAMPBELL, and KENNETH PIESLAK, from enforcement and application of Ordinances 03-17, 04-17 and 20-17.
2. Enjoining Defendants, TOWNSHIP OF JACKSON, NEW JERSEY, MICHAEL REINA, ROBERT NIXON, HELENE SCHLEGEL, JEFFREY PURPURO, WILLIAM CAMPBELL, and KENNETH PIESLAK, from monitoring, surveilling, targeting, harassing and interfering with the constitutionally protected right of the Orthodox Jewish residents of the Township of Jackson to the free exercise of religious beliefs within the privacy of their own homes for the gathering of people for religious services.
3. An Order granting such other, further and different relief that this Court deems appropriate.

Plaintiffs do hereby incorporate their Memorandum and Declarations submitted in support of this Motion as well as Plaintiffs' Second Amended Complaint (Dkt. #40).

Plaintiffs request oral argument with respect to this Motion pursuant to Local Rule 78.1.

Dated: September 6, 2019

STORZER & ASSOCIATES, P.C.

/s/ Sieglinde K. Rath

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of September, 2019, the foregoing document, supporting Declarations, Exhibits, Memorandum and proposed form of Order were electronically filed via the Court's ECF system with notices to the following:

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